

REMARKS

35 U.S.C. § 103 Rejections

The Examiner has rejected claims 1-10 under 35 U.S.C. § 103(a) as being obvious over Agarwal in view of Eimori. Applicant submits that these claims are patentable over the cited references.

Agarwal in Figure 4 illustrates lower electrode structures 14-16 and 18 (word lines), in Figure 5 illustrates upper conductive structures 34, 36, and 38 (bit lines), and a polymer ferroelectric material 30 between the word lines and the bit lines.

Eimori in Figure 2 illustrates word lines 4, in Figure 3 illustrates bit lines 15, and in Figures 2 and 3 illustrates node contact 17. What should be noted is that the node contacts 17 are not between the word and bit lines 4 and 15. Applicant has difficulty seeing how the polymer-based ferroelectric memory structure of Agarwal can be combined with the semiconductor memory device of Eimori having off-pitch node contacts 17. Applicant therefore submits that claim 1 should be patentable over the combination of references.

Claims 2-4 depend from claim 1, and should be allowable for at least the same reasons as claim 1.

Referring to Figure 7 of Agarwal, two structures 60 and 60' are formed on top of one another, each structure having an insulating substrate

("SUBSTRATE"). Each structure 60 has only one polymer ferroelectric layer 30. The polymer ferroelectric material 30 of the bottom structure 60 is charged with the bit lines 20 and 24 of the bottom structure 60. The polymer ferroelectric layer 30 of the upper structure 60' is not activated by the bit lines 20 and 22 of the bottom structure 60.

Claim 5 now specifically includes the limitation that each multi-layer construction has two ferroelectric polymer memory materials on opposing sides of the bit lines, both materials being charged by the bit lines. Claim 5 thus includes at least one limitation that is not suggested by Agarwal. Eimori, as previously discussed, appears to be irrelevant to begin with, and does not disclose a multi-layer construction having bit lines changing ferroelectric material on opposing sides thereof. The combination of Agarwal and Eimori thus fails to suggest or disclose at least one limitation of claim 5. Claims 6 and 7 depend from claim 5, and should be allowable for at least the same reasons as claim 5.

Claim 8 includes limitations that are similar to claim 1, in the sense that the differential spacing of word lines and bit lines of a polymer memory are claimed. Claim 8 should thus be allowable for similar reasons as claim 1. Claims 9 and 10 depend from claim 8 and should be allowable for at least the same reasons as claim 8.

Applicant, accordingly, respectfully requests withdrawal of the rejections of claims 1-10 under 35 U.S.C. § 103(a) as being obvious over Agarwal in view of Eimori.

Applicant respectfully submits that the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Stephen M. De Klerk at (408) 720-8300.

Please charge any shortages and credit any overages to Deposit Account No. 02-2666. Any necessary extension of time for response not already requested is hereby requested. Please charge any corresponding fee to Deposit Account No. 02-2666.

Respectfully submitted,

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